

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IQVIA HOLDINGS INC.,

and

PROPEL MEDIA, INC.

Defendants.

Case No. 1:23-cv-06188-ER

PARTIES' JOINT STIPULATED GLOSSARY OF KEY TERMS

Plaintiff Federal Trade Commission (“FTC” or “Plaintiff”) and Defendants IQVIA Holdings Inc. (“IQVIA”) and Propel Media, Inc. (“PMI”) jointly submit the below glossary of certain key case terms.

Term	Definition
1:1 advertising	Ads targeted to a specific individual, or ads targeted to a digital identifier linked to a specific individual or that individual’s device.
Ad	Short for advertisement.
Ad agency	Firm that helps advertisers plan, design, execute, and optimize advertising campaigns or runs campaigns on their behalf.
Ad exchange	A technology platform that collects bids from a variety of demand sources (advertisers) and determines a winner by running an auction.
Advertiser	A person or company who wants to send an ad to specific people or categories of people.
Ad tech stack	A collection of technology components that facilitate digital advertising.
AI	Artificial intelligence, including large language models.

Term	Definition
Brand	In the context of pharmaceuticals, brand can refer to the manufacturer (e.g., Pfizer), the drug (e.g., Ozempic), or the underlying molecule (e.g., semaglutide).
Campaign	A series of related ads for a brand or product.
CIM	Confidential information memorandum. Sometimes created by a company looking to be acquired (or created by that company's bankers) and provided to potential acquirers. May be spelled "SIM" in transcripts.
Claims data	Data on insurance claims made for prescriptions (i.e., pharmacy claims) or medicines or devices provided in connection with medical treatment (i.e., medical claims). May include the healthcare professional who wrote the prescription, the date of the prescription, the particular drug prescribed, and the insurance company that paid for all or part of the prescription. For medical claims, may also include diagnosis information.
CMI	CMI Media Group ("CMI") is a healthcare marketing agency that specializes in media buying, planning and marketing solutions for healthcare companies. They are a subsidiary of WPP Communication Company ("WPP").
CMS	Centers for Medicare & Medicaid Services. A government agency within the U.S. Department of Health and Human Services.
Cohort	A group of anonymized individuals, rather than a specific individual or a group of specific individuals. For example, a cohort for advertising purposes could be a group of consumers, some of whom may be interested in receiving information about a new medicine.
Connected TV (cTV)	Streaming service or smart television connected to Internet. For example, LG and Samsung sell "smart TVs" that are connected TV devices and Google's YouTube provides a streaming service.
Contextual ad	Online ad targeted on the characteristics of the content adjacent to the ad inventory (e.g., topic, genre, keywords, and tone).
Cookies	Small files of information about an individual user's online behavior that are generated from the user's activity online and associated with a particular computer or device.
CPM	Cost per mille (thousand). Cost for 1000 ad impressions.
Creative	The creative and substantive content of the advertisement
CUX	Customer experience.
Deprecate	To gradually eliminate the use of something.
Digital ads	Ads served through digital media (e.g., direct e-mail, Google search ads, display and video ads on websites, social media, or mobile devices, ads on connected TV).

Term	Definition
Display ads	Graphic ads (e.g., banners, text, images, video, and audio).
DMD	DMD Marketing Solutions. Firm acquired by IQVIA in August 2021. Sells HCP identity data used for advertising to HCPs, including email and programmatic advertising.
Doe	The project code name used by IQVIA for the acquisition of DeepIntent.
DTC	Direct-to-consumer/direct-to-patient.
EMR	Electronic medical records.
Endemic website	A healthcare-focused website, such as WebMD or Medscape.
Engagement	An individual's interaction with a particular advertisement.
Geotargeting	Targeted advertising based on an individual's geographic location.
HC	Healthcare
HCO (U.S.)	Health Care Organization. Hospitals, clinics, integrated healthcare systems and other provider organizations in the United States.
HCP (U.S.)	Healthcare Professional. Medical doctors, osteopaths, dentists, nurse practitioners, physicians' assistants and other medical professionals authorized to provide medical services to patients in the United States.
HMT	Hypothetical Monopolist Test.
Impression	Each instance a digital ad is shown to an individual.
Inventory	Space that a publisher makes available to be sold for ad placement, such as a banner ad on the New York Times website.
IO	Insertion order. An agreement between a publisher and an advertiser to run an ad campaign.
KPI	Key performance indicator. A measurement of success for a measured activity.
Lasso	Healthcare advertising platform acquired by IQVIA in July 2022. Rebranded as the IQVIA Operating System (IQVIA OS).
London	The project code name used by IQVIA for the acquisition of Lasso.
MedData Group (MDG)	Firm acquired by IQVIA in 2019. MDG's primary business is the sale of HCP identity data used for HCP audiences.
Non-endemic website	A website that is not healthcare-focused, such as ESPN or CNN.
NPI	National Provider Identifier, an identifying number issued by the government to all HCPs.

Term	Definition
Optimization	Using data to make decisions to enhance the performance of a digital advertising campaign.
Online identity data	Information about a user's online behavior that can be used to target groups of individuals (in the case of DTC) or specific individuals based on NPI number (in the case of HCP).
Paid search	A form of digital advertising that is conducted by placing ads to users based on their search keywords/results (typically on Google).
PHM	Publicis Health Media ("PHM") is a healthcare marketing agency that specializes in media buying, planning and marketing solutions for healthcare companies. They are a subsidiary of the Publicis Groupe.
Publicis	Publicis is a strategic creative and digital ideas marketing agency. The Publicis Groupe owns PHM.
Publisher	An organization that publishes books, magazines, newspapers, or other information in paper and/or web form. For example, the New York Times is a non-healthcare publisher. The New England Journal of Medicine is healthcare publisher. Publishers typically sell available space in their publications as ad inventory.
ROI	Return on investment. One of the measures of performance of an advertising campaign that includes cost.
RFI	Request for information. The solicitation of information for potential bidders for an opportunity.
RFP	Request for proposal. The solicitation of proposals from potential bidders for an opportunity.
Script lift	The difference in the number of prescriptions issued by an HCP that is exposed to advertising for a particular drug before and after an advertising campaign.
Social media	Websites or mobile sites used for social networking. May be general (e.g., Facebook, LinkedIn) or healthcare-focused (e.g., Doximity, Sermo).
SOW	Statement of work. A contractual document between two parties that outlines the scope, timeline, and price for products or services to be provided by one party to the other party.
SSNIP	Small but Significant Non-Transitory Increase in Price.
SSP	Supply side platform. Auction-based technology platform used by publishers to sell ad inventory.
TTD	The Trade Desk.

Term	Definition
UI	User interface.
Unified ID	Identity solution created by the Trade Desk for cookieless targeted advertising.
UX	User experience.
WPP	WPP Communication Company ("WPP") is a British multinational communications, advertising, public relations, technology, and commerce holding company. They own CMI.

Dated: December 7, 2023

Respectfully submitted,

/s/

Chantale Fiebig
Mark A. Perry
Joshua M. Wesneski
Weil, Gotshal & Manges LLP
2001 M Street NW, Suite 600
Washington, DC 20036
Chantale.fiebig@weil.com
Mark.perry@weil.com
Joshua.wesneski@weil.com

Kenneth Reinker
Cleary Gottlieb Steen & Hamilton LLP
2112 Pennsylvania Avenue, NW
Washington, DC 20037
Tel: (202) 974-1500
kreinker@cgsh.com

Rahul Mukhi
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, NY 10006
Tel: (212) 225-2000
rmukhi@cgsh.com

Counsel for Defendant IQVIA Holdings, Inc.

/s/

MORRISON & FOERSTER LLP
Alexander P. Okuliar (pro hac vice)
David J. Shaw (pro hac vice pending)
Alexa Rae DiCunzolo (pro hac vice)
Evan M. Harris (pro hac vice)
Andrew J. Molina (pro hac vice)
Kevin Wang (pro hac vice)
Richelle Gernan (pro hac vice)
2100 L Street, NW, Suite 900
Washington, DC 20037
Tel: (202) 887-1500
aokuliar@mofo.com
dshaw@mofo.com
adicunzolo@mofo.com
eharris@mofo.com
amolina@mofo.com
kwang@mofo.com
rgernan@mofo.com

Michael B. Miller
Mika M. Fitzgerald
250 West 55th Street
New York NY 10019
T: (212) 468-8000
mbmiller@mofo.com
mfitzgerald@mofo.com
Counsel for Defendant Propel Media, Inc.

/s/

Jennifer Fleury (*pro hac vice*)
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580
jfleury@ftc.gov

Counsel for Plaintiff Federal Trade Commission